

IN THE COURT OF QUEEN'S BENCH OF NEW BRUNSWICK
TRIAL DIVISION
JUDICIAL DISTRICT OF SAINT JOHN

BETWEEN:

WALSH

ERIN MICHAEL WALSH and ANGELA

Plaintiffs

- and -

**THE PROVINCE OF NEW BRUNSWICK,
WILLIAM McCARROLL, THE
CORPORATION OF THE CITY OF ST.
JOHN, ALLEN BODECHON in his capacity
as Chief of Police of St. John and ALLEN
BODECHON personally, CLARENCE
COGSWELL in his capacity as Chief Police
of St. John and CLARENCE COGSWELL
personally, CHARLES BREEN in his
capacity as Chief of Police of St. John and
CHARLES BREEN personally, DAVID
SHERWOOD in his capacity as Chief of
Police of St. John and DAVID SHERWOOD
PERSONALLY, ERIC FERGUSON in his
capacity as Chief of Police of St. John and
ERIC FERGUSON personally, THE
ROYAL CANADIAN MOUNTED POLICE
and the ATTORNEY GENERAL OF
CANADA**

Defendants

**AFFIDAVIT OF DAVE STEELE
(SWORN MARCH 31, 2009)**

I, Dave Steele, of the City of Toronto, Province of Ontario, MAKE OATH AND SAY:

1. I am a second year law student at the University of New Brunswick Law School.
2. I have personal knowledge of the matters to which I depose in this affidavit. In those circumstances where I rely upon information provided to me by others, I state the source of my information which I verily believe to be true.
3. On Tuesday March 17, 2009 I attended at Ludlow Hall at the University of New Brunswick Law School with my classmates Joel (last name unknown) and Shane Martinez for the purposes of hearing the Attorney General of New Brunswick, T.J. Burke ("Attorney General") speak to a public assembly of law students from 11:30 am to 12:30 pm.
4. There was a reception held after the Attorney General's speech which I attended very briefly with my classmate Shane Martinez. When we were leaving the reception I saw Joel speaking to the Attorney General. This would have been approximately 12:30 pm or shortly thereafter.
5. At approximately 1 p.m. Joel came into the library area and approached Mr. Martinez and myself and said that we would never believe what the Attorney General said to him during the reception.
6. Joel advised us, amongst other things, that the Attorney General advised him of the following during their conversation at the reception:
 - (a) That the Attorney General believed that Mr. Walsh was in town at the time in question for the purposes of selling drugs; and
 - (b) That the Attorney General believed that this was not the first

time that Mr. Walsh had killed someone.

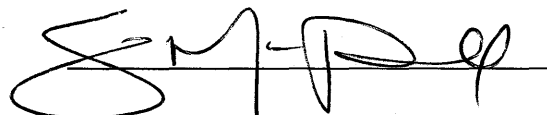
7. I am willing to provide the evidence contained in this affidavit at any proceeding relevant to this matter or any related matter(s) under oath and subject to cross-examination.

SWORN before me at the City of)

Fredericton, in the Province of)

New Brunswick, this 31st day of)

March, 2009)

A handwritten signature in black ink, appearing to be 'SMP' with a flourish at the end, written over a horizontal line.

A Commissioner etc.

A handwritten signature in black ink, appearing to be 'D Steele', written over a horizontal line.

Dave Steele